

REMARKS

In accordance with the foregoing, claims 1-25 are pending and under consideration. No new matter is presented in this Amendment.

REJECTIONS UNDER 35 U.S.C. §102:

Claims 1-25 are rejected under 35 U.S.C. §102(e) as being anticipated by Xu et al. (U.S. Patent Application Publication No. 2002/0070961), hereinafter "Xu." The Applicants respectfully traverse the rejection and request reconsideration.

Regarding the rejection of independent claim 1, it is noted that claim 1 recites a method of focusing on an input item in an object picture generated by an object program by "interpreting the object program... to generate input item map information necessary for focusing on the input items." In contrast, Xu discloses a method of focusing on a link (i.e., an input item) in a frame by a Web browser function. That is, assuming arguendo that the frame is an object picture, while the method of Xu does enumerate frames and links in the frames (paragraph [0045]), such an enumeration is not done by interpreting an object program. In fact, Xu makes no reference to an object program, and does not implicitly or explicitly suggest an interpreting of an object program.

Rather, in Xu, the frames and the links therein are enumerated by a Web browser identifying the frames and the links within a displayed Web page (paragraph [0067]). In his response to the Applicants' arguments filed on 2/27/2008, the Examiner states that the program function call (paragraph [0067]) is the object program. **However, the program function call is executed by the Web browser to perform a specific operation, and is certainly not a source document of an object picture (i.e., object program).** Specifically, the program function call enumerates the frames and links by creating an access point in the Web browser, and then using the access point to locate the frames and links displayed in the Web browser (paragraph [0067] and paragraph [0069]). Accordingly, the Web browser does not utilize the frame's source document (i.e., does not interpret an object program) to identify the links in the frame. Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, an interpreting of an object program, as recited in claim 1. Furthermore, regarding the rejection of independent claim 1, it is noted that claim 1 recites the markup picture "comprising additional information related to the object picture." In contrast, Xu teaches a Web page (i.e., markup picture) that only includes a plurality of frames (i.e., object pictures), and does not include additional information. Specifically, as the Title and the Abstract suggest, Xu relates to a method of moving a focus from an input item of one frame to an input item of a different frame. Thus, as illustrated in FIG.

4, Xu discloses a Web page consisting only of a plurality of frames. **The Examiner does not provide any citation in Xu for a teaching of the additional information.** Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, a markup picture including an object picture and additional information, as recited in claim 1.

Regarding the rejection of claim 2, it is noted that this claim depends from claim 1 and is, therefore, allowable for at least the reasons set forth above. In particular, it is noted that while claim 2 recites the object program as having an independent program structure, **Xu does not disclose an object program.**

Regarding the rejection of claim 3, it is noted that this claim depends from claim 1 and is, therefore, allowable for at least the reasons set forth above. In particular, it is noted that while claim 3 recites an interpreting of the object program to generate the input item map, Xu discloses a method of enumerating input items by a Web browser locating the input items in a displayed web page. That is, Xu does not disclose an interpreting of an object program, as recited in claim 3.

Regarding the rejection of claim 4, it is noted that this claim depends from claim 3 and is, therefore, allowable for at least the reasons set forth above.

Regarding the rejection of independent claim 5, it is noted that claim 5 recites a transmitting of a message from a markup interpretation engine to an object interpretation engine "for moving an input item focus **from inside of the markup picture**, but outside of the object picture embedded in the markup picture and outside of any other object picture, to inside of the object picture." In contrast, Xu teaches a method of moving a focus **from one frame to another frame** (Title, Abstract, and paragraph [0043]). That is, assuming arguendo that the frame is an object picture, Xu does not suggest moving the focus from a markup picture, but rather having the focus "jump between frames" (paragraph [0043]). Though the Applicants agree with the Examiner that a function call (message) is utilized to move the focus, the Applicants stress that the function call is not used to move the focus from the markup picture to the object picture (FIG. 5A, operation 510A clarifies that the focusing is initially in one object picture, as opposed to in the markup picture: "...inside the current frame"). **The Examiner does not provide any citation in Xu for a teaching of moving a focus between an object picture and a non-object markup picture. Furthermore, the Examiner does not provide any response to this argument made previously in the Amendment filed on 2/27/2008, and the Interview of March 3, 2008.** Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly

or explicitly, a moving of an input item focus from the markup picture (and not an object picture) to the object picture, as recited in claim 5.

Regarding the rejection of independent claim 6, it is noted that claim 6 recites a transmitting of a message from an object interpretation engine to a markup interpretation engine “for moving an input item focus from inside of the object picture **to inside of the markup picture**, but outside of the object picture embedded in the markup picture and any other object picture.” In contrast, Xu teaches a method of moving a focus **from one frame to another frame** (Title, Abstract, and paragraph [0043]). That is, assuming arguendo that the frame is an object picture, Xu does not suggest moving the focus to a markup picture, but rather having the focus “jump between frames” (paragraph [0043]). Though the Applicants agree with the Examiner that a function call (message) is utilized to move the focus, the Applicants stress that the function call is not used to move the focus from the object picture to the markup picture (FIG. 5A, clarifies that the focusing moves to another object picture, as opposed to the markup picture: operation 540A, “...is there an embedded frame in the direction of direction command,” and 590A, if no embedded frames found, exit). **The Examiner does not provide any citation in Xu for a teaching of moving a focus between an object picture and a non-object markup picture. Furthermore, the Examiner does not provide any response to this argument made previously in the Amendment filed on 2/27/2008, and the Interview of March 3, 2008.** Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, a moving of an input item focus from an object picture to a markup picture (and not another object picture), as recited in claim 6.

Regarding the rejection of claim 7, it is noted that this claim depends from claim 5 and is, therefore, allowable for at least the reasons set forth above. In particular, it is noted that claim 7 recites the message transmission comprising “transmitting information on a position of a **currently focused markup picture input item**.” In contrast, Xu teaches a method of moving a **currently focused object picture input item** (paragraph [0043]). In fact, FIG. 5A cited by the Examiner clarifies that the focusing is initially in one object picture, as opposed to in the markup picture (operation 510A, “...inside the current frame”). Therefore, the Applicants respectfully submit that Xu fails to disclose a transmission of information on a position of a currently focused **markup picture input item**, as recited in claim 7.

Regarding the rejection of claim 8, it is noted that this claim depends from claim 7 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 8

recites a moving of “the focus from **the currently focused markup picture input item** to a next object picture input item.” In contrast, Xu teaches a method of moving a **currently focused object picture input item focus** (i.e., moving the input item from one object frame to another object frame). In fact, FIG. 5A cited by the Examiner clarifies that the focusing is initially in one object picture, as opposed to in the markup picture (operation 510A, “...inside the current frame”). Therefore, the Applicants respectfully submit that Xu fails to disclose a moving of the focus from the markup picture input item to the object picture input item, as recited in claim 8.

Regarding the rejection of claim 9, it is noted that this claim depends from claim 5 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 9 recites a moving of “the focus from **the currently focused markup picture input item** to a next object picture input item.” In contrast, Xu teaches a method of moving an **object input item focus** (i.e., moving the input item from one object frame to another object frame). In fact, FIG. 5A cited by the Examiner clarifies that the focusing is initially in one object picture, as opposed to in the markup picture (operation 510A, “...inside the current frame”). Therefore, the Applicants respectfully submit that Xu fails to disclose a moving of the focus from the markup picture input item to the object picture input item, as recited in claim 9.

Regarding the rejection of independent claim 10, it is noted that claim 10 recites an information storage medium including an object program to display an object picture having at least one input item, the object program including “information on an input item type, information on a position of an input item, and information on an identification of an input item necessary for generating input item map information.” In contrast, Xu discloses a method of enumerating links (i.e., input items) in a frame by a Web browser function. That is, assuming *arguendo* that the frame is an object picture, while the method of Xu does enumerate frames and links in the frames (paragraph [0045]), such an enumeration is not done by interpreting an object program. In fact, Xu makes no reference to an object program, and does not implicitly or explicitly suggest an interpreting of an object program. Rather, in Xu, the frames and the links therein are enumerated by a Web browser identifying the frames and the links within a displayed Web page (paragraph [0067]). In his response to the Applicants’ arguments filed on 2/27/2008, the Examiner states that the program function call (paragraph [0067]) is the object program. **However, the program function call is executed by the Web browser to perform a specific operation, and is certainly not a source document of an object picture (i.e., object program).** Specifically, the program function call enumerates the frames and links by creating an access point in the Web browser, and then using the access point to locate the frames and

links displayed in the Web browser (paragraph [0067] and paragraph [0069]). Accordingly, the Web browser does not utilize the frame's source document (i.e., does not use information included in an object program) to identify or locate the links in the frame. Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, an object program, as recited in claim 10.

Regarding the rejection of claim 11, it is noted that this claim depends from claim 10 and is, therefore, allowable for at least the reasons set forth above.

Regarding the rejection of claim 12, it is noted that this claim depends from claim 10 and is, therefore, allowable for at least the reasons set forth above. In particular, it is noted that while claim 12 recites the object program as having an independent program structure, Xu does not disclose an object program.

Regarding the rejection of independent claim 13, it is noted that claim 13 recites "transmitting a message for moving a focus on one of the object picture input items... and **focusing on one of the markup picture input items...** in response to the message." In contrast, Xu teaches a method of moving a focus **from one frame to another frame** (Title, Abstract, and paragraph [0043]). That is, assuming arguendo that the frame is an object picture, Xu does not suggest moving the focus to a markup picture, but rather having the focus "jump between frames" (paragraph [0043]). Furthermore, FIG. 5A clarifies that the focusing moves to another object picture, as opposed to the markup picture (operation 540A, "...is there an embedded frame in the direction of direction command," and 590A, if no embedded frames found, exit). **The Examiner does not provide any citation in Xu for a teaching of moving a focus between an object picture and a non-object markup picture. Furthermore, the Examiner does not provide any response to this argument made previously in the Amendment filed on 2/27/2008, and the Interview of March 3, 2008.** Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, a moving of an input item focus from an object picture to a markup picture (and not another object picture), as recited in claim 13.

Regarding the rejection of claim 14, it is noted that this claim depends from claim 13 and is, therefore, allowable for at least the reasons set forth above.

Regarding the rejection of claim 15, it is noted that this claim depends from claim 13 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 15 recites a moving of "the focus from a currently focused object picture input item to a

next **markup picture input item.**" In contrast, Xu teaches a method of moving a focus **from one frame to another frame** (Title, Abstract, and paragraph [0043]). That is, assuming arguendo that the frame is an object picture, Xu does not suggest moving the focus to a markup picture (FIG. 5A clarifies that the focusing moves to another object picture, as opposed to the markup picture: operation 540A, "...is there an embedded frame in the direction of direction command," and 590A, if no embedded frames found, exit). Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, a moving of an input item focus from the object picture to the markup picture (and not an object picture), as recited in claim 15.

Regarding the rejection of claim 16, it is noted that this claim depends from claim 13 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 16 recites a moving of "the focus from a currently focused object picture input item to a next **markup picture input item.**" In contrast, Xu teaches a method of moving a focus **from one frame to another frame** (Title, Abstract, and paragraph [0043]). That is, assuming arguendo that the frame is an object picture, Xu does not suggest moving the focus to a markup picture (FIG. 5A clarifies that the focusing moves to another object picture, as opposed to the markup picture: operation 540A, "...is there an embedded frame in the direction of direction command," and 590A, if no embedded frames found, exit). Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, a moving of an input item focus from the object picture to the markup picture (and not an object picture), as recited in claim 16.

Regarding the rejection of independent claim 17, it is noted that claim 17 recites "moving an input item focus... from a markup picture input item to an object picture input item, and from an object picture input item to a markup picture input item according to a predetermined order." In contrast, Xu teaches a method of moving a focus **from one frame to another frame** (Title, Abstract, and paragraph [0043]). That is, assuming arguendo that the frame is an object picture, Xu does not suggest moving the focus from a markup picture or to a markup picture, but rather having the focus "jump between frames" (paragraph [0043]). Specifically, the Applicants note that the method of Xu does not move the focus from the markup picture to the object picture (FIG. 5A, operation 510A clarifies that the focusing is initially in one object picture, as opposed to in the markup picture: "...inside the current frame"). Similarly, the Applicants note that the method of Xu does not move the focus from the object picture to the markup picture (FIG. 5A, clarifies that the focusing moves to another object picture, as opposed to the markup picture: operation 540A, "...is there an embedded frame in the direction of direction command," and 590A, if no embedded frames found, exit). **The Examiner does not provide any citation in Xu**

**for a teaching of moving a focus between an object picture and a non-object markup picture. Furthermore, the Examiner does not provide any response to this argument made previously in the Amendment filed on 2/27/2008, and the Interview of March 3, 2008.**

Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, a moving of a focus between an object picture and a markup picture, as recited in claim 17.

Regarding the rejection of claims 18-20, it is noted that these claims depend from claim 17 and are, therefore, allowable for at least the reasons set forth above.

Regarding the rejection of independent claim 21, it is noted that claim 21 recites "moving an input item focus... from a markup picture input item to a DVD object picture input item, and from a DVD object picture input item to a markup picture input item." In contrast, Xu teaches a method of moving a focus **from one frame to another frame** (Title, Abstract, and paragraph [0043]). That is, assuming arguendo that the frame is an object picture, Xu does not suggest moving the focus from a markup picture or to a markup picture, but rather having the focus "jump between frames" (paragraph [0043]). Specifically, the Applicants note that the method of Xu does not move the focus from the markup picture to the object picture (FIG. 5A, operation 510A clarifies that the focusing is initially in one object picture, as opposed to in the markup picture: "...inside the current frame"). Similarly, the Applicants note that the method of Xu does not move the focus from the object picture to the markup picture (FIG. 5A, clarifies that the focusing moves to another object picture, as opposed to the markup picture: operation 540A, "...is there an embedded frame in the direction of direction command," and 590A, if no embedded frames found, exit). **The Examiner does not provide any citation in Xu for a teaching of moving a focus between an object picture and a non-object markup picture. Furthermore, the Examiner does not provide any response to this argument made previously in the Amendment filed on 2/27/2008, and the Interview of March 3, 2008.** Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, a moving of a focus between an object picture and a markup picture, as recited in claim 21.

Regarding the rejection of independent claim 22, it is noted that claim 22 recites "moving an input item focus... from an interactive picture input item to an object picture input item, and from an object picture input item to an interactive picture input item." In contrast, Xu teaches a method of moving a focus **from one frame to another frame** (Title, Abstract, and paragraph [0043]). That is, assuming arguendo that the frame is an object picture, Xu does not suggest moving the focus from an interactive picture (in which the object picture is embedded) or to an

interactive picture (in which the object picture is embedded), but rather having the focus “jump between frames” (paragraph [0043]). Specifically, the Applicants note that the method of Xu does not move the focus from the interactive picture to the object picture (FIG. 5A, operation 510A clarifies that the focusing is initially in one object picture, as opposed to in the interactive picture: “...inside the current frame”). Similarly, the Applicants note that the method of Xu does not move the focus from the object picture to the interactive picture (FIG. 5A, clarifies that the focusing moves to another object picture, as opposed to the interactive picture: operation 540A, “...is there an embedded frame in the direction of direction command,” and 590A, if no embedded frames found, exit). **The Examiner does not provide any citation in Xu for a teaching of moving a focus between an object picture and a non-object markup picture. Furthermore, the Examiner does not provide any response to this argument made previously in the Amendment filed on 2/27/2008, and the Interview of March 3, 2008.** Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, a moving of a focus between an object picture and an interactive picture, as recited in claim 22.

Regarding the rejections of claims 23-25, it is noted that these claims depend from claim 22 and are, therefore, allowable for at least the reasons set forth above.

Based on the foregoing, this rejection is respectfully requested to be withdrawn.

**CONCLUSION:**

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.


Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 503333.

Respectfully submitted,

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